

David Chiu (SBN 189542)
City Attorney
Yvonne R. Meré (SBN 175394)
Chief Deputy City Attorney
Mollie M. Lee (SBN 251404)
Chief of Strategic Advocacy
Sara J. Eisenberg (SBN 269303)
Chief of Complex and Affirmative Litigation
Molly J. Alarcon (SBN 315244)
Alexander J. Holtzman (SBN 311813)
Deputy City Attorneys
OFFICE OF THE CITY ATTORNEY
FOR THE CITY AND COUNTY OF
SAN FRANCISCO
1390 Market Street, 7th Floor
San Francisco, CA 94102
molly.alarcon@sfcityatty.org
alexander.holtzman@sfcityatty.org

Attorneys for Plaintiff
City and County of San Francisco

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et*
al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698

**DECLARATION OF ADRIENNE
BEHELLI IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY RELIEF**

DECLARATION OF ADRIENNE BECHELLI

I, Adrienne Bechelli, declare as follows:

1. I am the General Manager of the Bay Area Urban Areas Security Initiative (“BAUASI”), a regional agency that administers federal emergency management grants dedicated to preventing, protecting against, responding to, and recovering from terrorist incidents and catastrophic events for its members—the three major Bay Area cities and its 12 counties. The City and County of San Francisco (“San Francisco”) is the fiscal agent of BAUASI and receives significant funding and support for emergency management activities as a member of BAUASI. Before being appointed as General Manager of BAUASI, I was Deputy Director for Emergency Services at the Department of Emergency Management (“DEM”) of San Francisco from 2020 to 2024. In that role, I led San Francisco’s response to many events of citywide significance including the COVID-19 pandemic, extreme weather emergencies, and the 2023 Asia-Pacific Economic Cooperation Leaders’ Summit. Before my role as Deputy Director of DEM, I served as Chief of Staff for DEM and as an emergency training and exercise planner for the San Francisco Public Utilities Commission.

2. I obtained my Bachelor’s Degree in Sociology from the University of California, Santa Barbara and Master’s Degree in Public Administration from the University of San Francisco. Except where otherwise indicated, the following facts are known to me personally, and if called upon as a witness, I would testify to them competently.

3. It is already evident that layoffs by the federal government at the Federal Emergency Management Agency (“FEMA”) are causing harm to San Francisco and other cities. BAUASI receives most of its funding from FEMA through the California Governor’s Office of Emergency Services (Cal OES). My understanding is that FEMA did not have sufficient personnel to efficiently perform a newly-implemented policy of manual review of federal grants, effective until last week, and therefore paused disbursement of funding to their recipients. I understand that this manual review process was preliminarily enjoined by a court and that FEMA resumed disbursements to Cal OES as of last week. But it is unclear how long this processing of

1 reimbursement requests will continue and if there are genuinely sufficient staff at FEMA to do
2 that work. Some of these grants are funds specifically targeting high-density urban areas at high
3 risk of terrorism. We at BAUASI are now by necessity considering pausing critical
4 counterterrorism work because Cal OES will not reimburse BAUASI for previously awarded and
5 approved projects until FEMA disburses funding to Cal OES. Further, the residual impacts of
6 potential pauses on these projects trickle down to the subrecipients of BAUASI, including 14
7 jurisdictions and their residents across the SF Bay Area.

8 4. Based on my prior work as DEM Deputy Director, I also believe widespread and
9 unanticipated layoffs at FEMA, the Small Business Administration (SBA), National Oceanic and
10 Atmospheric Administration (NOAA), and National Parks Service (NPS) will likely negatively
11 impact San Francisco's ability to respond to and recover from emergencies. Some examples are
12 listed below:

13 a. **FEMA:** In order for local jurisdictions to unlock "Public Assistance"
14 (reimbursements up to 75% for emergency or permanent recovery costs incurred by a public
15 entity) or "Individual Assistance" (financial assistance to eligible individuals impacted by a
16 disaster) from FEMA following a major disaster, teams from FEMA must travel to the
17 emergency site to perform site visits (known as Preliminary Damage Assessments, or "PDAs")
18 to determine whether enough damage was incurred to meet thresholds required to request and
19 receive a presidential disaster declaration. After the 2022/2023 Early Winter Storms federal
20 emergency declaration, members of FEMA came to San Francisco to perform PDAs for both
21 potential Public Assistance and Individual Assistance eligibility. Without sufficient FEMA staff
22 to travel to disaster locations and perform these assessments, public entities could lose the
23 opportunity to qualify for assistance, thereby negatively impacting their ability to recover from
24 disasters.

25 b. **SBA:** The SBA provides disaster assistance for businesses and homes
26 (both owners and renters) in the form of low-interest loans to cover losses not covered by
27 insurance or FEMA or for business operating expenses that could have been met had the disaster
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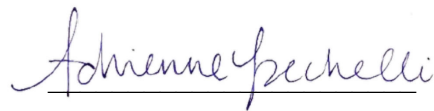
1 not occurred. After the 2022/2023 Early Winter Storms federal emergency declaration, members
2 of the SBA came to San Francisco to perform a Joint PDA with FEMA to determine if thresholds
3 were met to unlock SBA disaster assistance. The SBA also set up an in-person Disaster Loan
4 Outreach Center following the 2022/2023 winter storms for three weeks in order to answer
5 questions about SBA's disaster loan program, explain the application process, and help
6 individuals complete loan applications. Without sufficient SBA staff to travel to disaster
7 locations to perform these assessments and provide loan application technical assistance, this
8 would prevent residents in disaster areas from understanding how to apply for low-interest
9 federal disaster loans, therefore hindering their ability to rebuild and recovery from disasters.

10 c. **NWS (a division of NOAA):** When San Francisco activates its
11 Emergency Operations Center (EOC) for weather disasters, representatives from the National
12 Weather Service (NWS), a division of NOAA, are included in the Command/Management
13 Section of the EOC. We rely on NWS forecasts, for example, to inform our recommendations
14 for citywide operational posture and resource staging, such as the activation of wellness checks
15 for vulnerable populations, deployment of flood barriers along 17th and Folsom, and
16 precautionary closure of public parks. Further, during planned events that bring thousands of
17 visitors to the city, such as the New Year's Eve fireworks display or Pride parade, we rely on
18 NWS forecasts and modeling to determine if we should expect additional weather-related
19 impacts that would influence our operations. For example, heavy fog impacts firework visibility,
20 leading to a smaller crowd and extreme heat during a parade could cause an increase in medical
21 calls. Without on-call NWS staff support and tailored modeling, we would lose valuable time
22 piecing together and attempting to verify other sources of data to make decisions about
23 preparations for weather emergencies. Because we do not have in-house meteorologists, we lack
24 access to spot weather and storm forecasts that are as reliable and verifiable as NWS and NOAA
25 data.
26

27 d. **U.S. Park Police (a division of NPS):** During coastal emergencies,
28 members of the U.S. Park Police, serve as essential first responders on and alongside federal

1 property in San Francisco. During the Tsunami Advisory in January 2022 and Tsunami Warning
2 in December 2024, U.S. Park Police assisted with performing in-person evacuations of the
3 beaches, shorelines, and federal property (Fort Funston, Fort Mason, Fort Point, Presidio) within
4 the inundation zones. During emergencies, U.S. Park Police act as a force multiplier for local law
5 enforcement as well as the lead agency for incidents on federal property. Without these essential
6 authorized and trained first responder staff, residents and guests of San Francisco could die or be
7 seriously injured during emergencies.

8 I declare under penalty of perjury under the laws of the United States that the foregoing is
9 true and correct. Executed April 29, 2025 at San Francisco, California.

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14 Adrienne Bechelli
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